

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 6:21-CR-43
v.	§	JUDGE JDK/KNM
	§	
LOIS BOYD (01)	§	

ELEMENTS OF THE OFFENSE

COMES NOW, the United States of America, by and through the United States Attorney for the Eastern District of Texas, and files this pleading summarizing the elements of the offense to which the defendant intends to enter a plea of guilty to Count 1 of the Indictment.

Title 18, United States Code, Section 1952, makes it a crime for anyone to travel in interstate or foreign commerce, or to use the mail, or any facility in interstate or foreign commerce, with intent to commit or facilitate certain unlawful activity, and thereafter perform or attempt to perform that unlawful activity.

To establish that the defendant is guilty of violating the Travel Act, the government must prove the following beyond a reasonable doubt:

First: That the defendant traveled in interstate commerce or used any facility in interstate commerce;

Second: That the defendant did so with the specific intent to promote, manage, establish, or carry on unlawful activity or distribute the proceeds of unlawful activity; and

Third: That subsequent to the act of travel or the use of any facility in interstate commerce the defendant did knowingly and willfully promote, manage, establish, or carry on such unlawful activity.

Respectfully submitted,

BRIT FEATHERSTON
UNITED STATES ATTORNEY

/s/ Nathaniel C. Kummerfeld
NATHANIEL C. KUMMERFELD
Assistant United States Attorney
Texas Bar No. 24060122
110 N. College, Ste. 700
Tyler, TX 75702
(903) 590-1400
(903) 590-1439 (fax)
Nathaniel.Kummerfeld@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Elements of the Offense was served on counsel of record for defendant by email on this the 8th day of June, 2022.

/s/ Nathaniel C. Kummerfeld
Nathaniel C. Kummerfeld